



Department
for Transport

Consultation on a new CO₂ emissions regulatory framework for all newly sold road vehicles in the UK

Introduction

Thank you for responding to our consultation on establishing a new CO₂ emissions regulatory framework for all newly sold road vehicles in the UK.

The closing date for this consultation in 23:45 on is 22nd September 2021. Please send your completed response form to CO2RegulationGP@dft.gov.uk.

Due to remote working, we strongly encourage responses by email. If you are unable to respond by email, we would invite you to please let us know by asking someone to email on your behalf.

If none of the above is possible, then we invite you to send written responses to:

CO2 Regulation Green Paper consultation
Great Minister House
33 Horseferry Road
London
SW1P 4DR

About this consultation

Background

Removing all tailpipe emissions from road vehicles is fundamental to decarbonising transport. In total, road vehicles are responsible for 91% of the UK's annual domestic transport CO₂ emissions. Cars and vans alone are responsible for 70% of that total.

In November 2020 the Prime Minister announced that we would be publishing a Green Paper on the future CO₂ regulatory framework that is to apply to new road cars, vans, and other road vehicles. This Green Paper puts forward two potential frameworks that we feel could be deployed in order to legislate for our already agreed petrol and diesel phase out dates, and to set a regulatory pathway that will lead to net zero emissions from road transport.

This Green Paper also seeks to define 'significant zero emission capability' establishing the technical requirements that vehicles will need to meet between 2030 and 2035.

Consultation proposals

We are seeking views on two regulatory frameworks that could deliver on our petrol and diesel phase out commitments, while also supporting additional carbon reductions in the lead up to those dates -

- 'tightening' the existing efficiency-based regulations, requiring the new vehicle fleet to become more efficient; and
- Deploying a Zero Emission Vehicle Mandate (ZEV Mandate) as recommended by the Climate Change Committee, alongside a CO₂ regulation.

We are also seeking views on a number of regulatory aspects that will need to be considered when developing the future framework. This includes, but is not limited to –

- The vehicle models which should be in scope;
- Whether derogations/exemptions should apply in certain cases;
- The level of fines that should be issued for non-compliance.

Finally, we are also seeking views on the definition of 'significant zero emission capability' by asking questions on –

- Eligibility metrics
- Eligibility thresholds
- Other compliance considerations

Confidentiality and data protection

The Department for Transport (DfT) is carrying out this Green Paper consultation to engage and gather views and evidence on a New Road Vehicle CO₂ Emissions Regulatory Framework for the United Kingdom. This consultation and the processing of personal data that it entails is necessary for the exercise of our functions as a government department. If your answers contain any information that allows you to be identified, DfT will, under data protection law, be the Controller for this information.

As part of this consultation we're asking for your name, email address and organisation. This is in case we need to ask you follow-up questions about any of your responses. You do not have to give us this personal information. If you do provide it, we will use it only for the purpose of asking follow-up questions. We will not use your name or other personal details that could identify you when we report the results of the consultation.

[DfT's privacy policy](#) has more information about your rights in relation to your personal data, how to complain and how to contact the Data Protection Officer.

Your information will be kept securely on a secure IT system within DfT and destroyed within 12 months after the consultation has been completed.

Your details

1. Your and email address:

Name: (Redacted - Regulation 13 of the Environmental Information Regulations 2004)

Email: (Redacted - Regulation 13 of the Environmental Information Regulations 2004)

2. Are you responding: *

on behalf of an organisation?

Organisation details

3. You are responding as:

a representative of a business or firm?

Suzuki GB PLC

Consultation Questions

Significant Zero Emission Capability

- 1. What metric, or combination of metrics should be used to set eligibility for cars and vans between 2030 and 2035?**

No comment

- 2. For your chosen metric, what threshold should new cars and vans be required to meet from 2030?**

No comment

- 3. What other requirements could be introduced, if any, to maximise zero emission capability?**

No comment

- 4. What would the impact be on different sectors of industry and society in setting an SZEC requirements, using evidence where possible?**

No comment

Possible Future Frameworks

- 5. Do you have any comments regarding Option 1, to replicate the current regulatory framework, albeit with strengthened targets, to meet our wider carbon reduction targets and phase out dates?**

No comment

- 6. Do you have any comments regarding Option 2, to introduce a ZEV Mandate or sales target alongside a CO₂ regulation?**

No comment

- 7. Do you have any views on the Government's initial preference for the regulatory approach set out in Option 2?**

No comment

- 8. Are there alternative approaches that could deliver on the government's carbon budget and 2030/2035 commitments?**

No comment

9. Do you have any views on how either, or both, of the options could be implemented?

No comment

10. Do you have any further comments or evidence which could inform the development of the new framework?

No comment

Additional Issues for Consideration

Stringency of CO₂ Target

- 11. Do you have any further comments or evidence which could inform the development of the new framework?**

No comment

- 12. Should the focus be on delivering the largest possible CO₂ savings, or the quickest possible switch to zero emission mobility?**

No comment

- 13. How do we ensure that the target allows for sufficient supply of low and zero emission vehicles; supports investment in the UK; and delivers our carbon reduction commitments?**

No comment

Derogations and Exemptions

- 14. Should the new regulatory framework include exemptions or modified targets for certain specialist vehicles and/or niche and small volume manufacturers?**

No comment

Credit Levels

- 15. Should credits be awarded to vehicles that meet the SZEC definition?**

Yes

No

Don't know

No comment

Please explain your answer.

No comment

- 16. If so, should this be a fixed number of credits, or should there be a sliding scale that recognises the difference in CO₂ efficiency of various SZEK-compliant vehicles?**

No comment

Credit Banking and Trading

- 17. Should this be considered within the new framework?**

Yes

No

Don't know

No comment

Please explain your answer.

No comment

- 18. If so, over what timeframe should they remain usable and should credits and debits be treated the same or differently?**

No comment

- 19. Within the trading element of the new scheme, should there be limits on the number of certificates/grams of CO₂ that can be bought or sold?**

Yes

No

Don't know

Please explain your answer.

No comment

- 20. Should such a market cover the whole of road transport or should there be some constraints imposed on trading across manufacturing sectors (e.g. cars and Heavy Duty Vehicles)?**

No comment

Credit Banking and Trading

- 21. How, and at what level, should fines be set in the new UK regulatory framework and should this vary for different vehicle types?**

No comment

Target setting process

In the future UK regulatory regime, we have the opportunity to determine how far ahead we set the targets, the lead in time for any change in targets and whether the option to amend targets at shorter notice is required. We would welcome views on each of these.

No comment

Real-World Emissions

- 22. Would there be benefits in seeking to ensure any CO₂ targets in the new UK regulatory framework take into account real-world emissions data alongside the lab-tested WLTP CO₂ emissions figures? If so, how might the two be linked?**

Yes

No

Don't know

Please explain your answer.

No comment

Extending the Framework to all Road Vehicles

Heavy Duty Vehicles

- 23. For vehicle sub-categories that are not yet covered by VECTO, could a ZEV Mandate/sales target be extended before VECTO is adapted?**

Yes

No

Don't know

Please explain your answer.

N/A

- 24. Would there be any unintended consequences of establishing a ZEV Mandate for certain vehicle sub-categories before a CO₂-based regulation?**

N/A

25. Do you have any views on imposing a CO₂ regulation on vehicle types that are not yet covered by a CO₂ test procedure, or existing regulation, particularly in light of the planned future phase out consultation for new non-zero emission buses?

Yes

No

Don't know

Please explain your answer.

N/A

L-Category vehicles (Motorbikes, Mopeds, Quad Bikes etc)

26. Should the preferred regulatory approach be extended to all L-category vehicles or should the diversity of the sector (motorbikes, mopeds, motorised tricycles, quadbikes, motorised quadricycles etc) necessitate different approaches?

Yes

No

Don't know

Please explain your answer.

The regulatory approach being considered for M and N categories should not be extended to all L-category vehicles. Furthermore, and as indicated by the DfT, L-category vehicles are extremely diverse and may need separate approaches according to the various sub-categories.

- Industry including Suzuki supports a move towards decarbonising transport for motorcycles (and other L-category vehicles) through a carbon neutral approach.
- L-category ICE vehicles are already low emitters of carbon due to their low mass and size and their ability to avoid congestion in traffic and their usage should be encouraged. Suzuki pledges to continue development of these ICE vehicles to further reduce their already low contribution through the application of advanced engine and other technologies.
- Carbon Neutrality is not the same as electrification and CN allows appropriate technologies to be applied to the different types of vehicles covered by the wide and diverse range of vehicles under the L-category.
- Industry including Suzuki expects certain elements of the L-category to be predominantly electrified by 2030 – 2-wheelers used for urban mobility for example (L1e, L3e-A1 and some L3e-A2).
- However, due to technology limitations (particularly on the battery side due to mass, size and range constraints) some L-category vehicle types (leisure and touring motorcycles for example) are not yet able to be electrified.

- **Battery and motor technology developed at scale for automobiles needs further development and time before it can be commercialised for implementation on the smaller, lighter and generally lower volumes and less expensive L-category vehicles.**
- **The scale of UK market for L-category is small compared to EU/global market and that any substantial deviation of UK regulations could result in some makers leaving the UK market which would give less choice to UK customers.**
- **Today, Suzuki is not able to support the inclusion of the L-Category sector into the regulation covered within the Green Paper for the reasons set out above. This position applies to the current regulatory framework, any modification of this framework or by way of ZEV Mandate as an outcome of this consultation.**

Additional Issues for Consideration

As the regulations develop, all potential aspects listed in chapter 5 will need to be considered for each vehicle type. Therefore, we would welcome any additional views on the application of the variables mentioned from paragraph 5.50 onwards, in respect of new HDVs (including the adaptations that should be made for different HDV types) and L-category vehicles.

No comment

Final comments

Any other comments?